

On Part I, Specialized Services:

I believe full disclosure of all sharing of broadband lines should be required. The only reasonable way for a consumer to compare broadband services is to know exactly how much broadband speed they will actually be permitted to use from the service, and when. If any other services or consumers share that bandwidth, that has to be disclosed, or the consumer is being lied to about how much bandwidth they actually have access to! It seems perfectly clear to me, as a normal, internet-using citizen, that selling one thing but actually providing another would be considered bait-and-switch, or fraudulent, in any other field. Why is this one given an exception to that rule?

If broadband speed varies depending on factors such as what the consumer chooses to use and how many consumers share a downline connection, that should be disclosed, but a guarantee of a minimum amount of available internet broadband should be provided, so that people can be assured of reasonable, actually-available bandwidth at whatever times they want to use it.

On Part II, Application of Open Internet Principles to Mobile Wireless Platforms:

Any product or service that charges based on consumption needs to be very clear in keeping the consumer informed about how much they are consuming. For example, at a grocery store, there are scales to weigh apples before you purchase them, so you can anticipate their cost.

The same needs to be true of Mobile Wireless Platforms. Currently, consumers on plans charging by the minute are able to verify their current consumption level for the billing period, and are able to easily measure the consumption of their current call. That is not currently true with data consumption.

There is an estimator in some places that allows you to guess at how much data you are using, but it is nearly impossible to know in advance how much you would actually use in any given instance. For example, if you want to look up local restaurants while you are on a road trip, there is no easy way to check in advance how much of your available data amount that look up would use. If it is the equivalent cost of \$0.20, you may think it is worth it, but an equivalent cost of \$5.00 may make it much less appealing.

Providing warnings in advance of reaching a data level or when exceeding it are not sufficient. Because each use of the data is costing money (going toward the included limit or exceeding it), the wise consumer must be able to choose what they use the data for with fully available information.

For example, someone using their phone to receive email messages (part of data cost) may want to be sure to reserve a percentage of their data for those messages. If they do not know how much data those messages are taking so far, they have no way of predicting how much they want to

reserve for the rest of the month's mail. A reasonable alternative would be to allow "100 email messages of up to 25kb a month" as included (with the first 25kb provided for longer messages and an option to access the rest prompting there is a cost), in addition to "25mb of other data, such as longer emails, attachments, web searches, etc". However, knowing how much data a web lookup will use is still critical, because if you can not judge how much of the 25mb a particular lookup will cost, it is impossible to determine if it is worth it. While data is harder to ascertain in advance, it should certainly be feasible for at least approximate amounts to be provided, much like estimates for anything else, and for notifications should the estimate turn out to be significantly different.

Of course, that all assumes consumers are clearly advised as to the beginning and end dates for every data period, as well.

Summary:

In summary, any service that includes significant installation and / or cancellation fees has to be up front with their consumers about what, exactly, the consumer is getting. Providing bandwidth of "up to" a specific amount is incredibly misleading if consumers are not permitted to use anywhere near that bandwidth on a regular basis, or if a significant portion of that bandwidth will be consumed by another service provided across it. Consumers need to be able to compare the actual internet bandwidth amount they are permitted to use in order to do an apples to apples comparison of costs!

The same holds true for data consumption. How much is 25 mb of data? If I am paying for overages, I need to be able to anticipate when those overages are going to occur and make the choice about whether or not I want to incur them. A phone plan and service that advertises the ability to email needs to clearly outline what that means to the data plan and how to control it.

I believe consumers should know what they are getting with these services, and the only way to do that is through open, thorough, and honest communication from internet and wireless providers. Don't quote me a speed I will never be able to use and that you do not want me to use, and don't sell me a set of features with a plan attached that does not actually allow me reasonable use of those features.

Thank you for your time.